

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
Houston DIVISION

Form To Be Used By A Prisoner in Filing a Complaint  
Under the Civil Rights Act, 42 U.S.C. § 1983

#604384, B16536, #290418, 1250833, #654322, #556412  
LIVINGSTON, Shelia, BROWN, BURTON, FLORENCE, ORCHABOE  
Plaintiff's name and ID Number ON BEHALF OF ~~KANS~~ AND OTHERS SIMILARLY SITUATED  
SEE EXHIBIT #3.1-2 ADDITIONAL PLAINTIFFS.

TDC-BPP ISF 1511 PRESTON AVE  
Place of Confinement HOUSTON, TX 77002

CASE NO: \_\_\_\_\_

(Clerk will assign the number)

JURY DEMAND

SUE IN INDIVIDUAL & OFFICIAL  
CAPACITIES

United States District Court  
Southern District of Texas  
FILED

JUN 19 2008

Michael N. Milby, Clerk

Geo Group Inc. 1511 Preston Ave

Defendant's name and address HOUSTON, TX 77002

TDC-BPP, P.O. Box 99 Huntsville, TX 77342

Defendant's name and address

TDC Access To Courts Director Frank Hove

Defendant's name and address P.O. BOX 99

(DO NOT USE "ET AL.") HUNTSVILLE, TX 77342

INSTRUCTIONS - READ CAREFULLY

NOTICE:

Your complaint is subject to dismissal unless it conforms to these instructions and this form.

1. To start an action you must file an original and one copy of your complaint with the court. You should keep a copy of the complaint for your own records.
2. Your complaint must be legibly handwritten in ink, or typewritten. You, the plaintiff, must sign and declare under penalty of perjury that the facts are correct. If you need additional space, DO NOT USE THE REVERSE SIDE OR BACK SIDE OF ANY PAGE. ATTACH AN ADDITIONAL BLANK PAGE AND WRITE ON IT.
3. You must file a separate complaint for each claim you have unless the various claims are all related to the same incident or issue or are all against the same defendant, Rule 18, Federal Rules of Civil Procedure. Make a short and plain statement of your claim, Rule 8, Federal Rules of Civil Procedure.
4. When these forms are completed, mail the original and one copy to the Clerk of the United States Court for the appropriate District of Texas in the Division where one or more named defendants are located, or where the incident giving rise to your claim for relief occurred. The list labeled as "VENUE LIST" is posted in your unit law library. It is a list of Texas prison units indicating the appropriate District Court, the Division and address of the Divisional Clerks.

1. In order for your complaint to be filed, it must be accompanied by the filing fee of \$350.00.
2. If you do not have the necessary funds to pay the filing fee in full at this time, you may request permission to proceed *in forma pauperis*. In this event you must complete the application to proceed *in forma pauperis* (IFP), setting forth the information to establish your inability to prepay the fees and costs or give security therefore. You must also include a six (6) month history of your Inmate Trust Account. You can acquire the application to proceed IFP and appropriate Inmate Account Certificate from the law library at your prison unit.
3. 28 U.S.C. 1915, as amended by the Prison Litigation Reform Act of 1995 (PLRA), provides, "...if a prisoner brings a civil action or files and appeal *in forma pauperis*, the prisoner shall be required to pay the full amount of a filing fee." Thus, the Court is required to assess and, when funds exist, collect, the entire filing fee or an initial partial filing fee and monthly installments until the entire amount of the filing fee has been paid by the prisoner. If you submit the application to proceed *in forma pauperis*, the Court will apply 28 U.S.C. 1915 and, if appropriate, assess and collect the entire filing fee or an initial partial filing fee, the monthly installments from your Inmate Account, until the entire \$350 filing fee has been paid.
4. If you intend to seek *in forma pauperis* status, then do not send your complaint without an Application to Proceed IFP, and the Certificate of Inmate Trust Account. Complete all the essential paperwork before submitting it to the Court.

#### CHANGE OF ADDRESS

It is your responsibility to inform the Court of any change of address and its effective date. Such notice should be marked "NOTICE TO THE COURT OF CHANGE OF ADDRESS" and shall not include a motion(s) for any other relief. Failure to file a NOTICE TO THE COURT OF CHANGE OF ADDRESS may result in the dismissal of your complaint pursuant to Rule 41(b), Federal Rules of Civil Procedures.

#### I. PREVIOUS LAWSUITS:

- A. Have you filed any other lawsuits in the state or federal court relating to imprisonment? \_\_\_\_\_ YES  NO
- B. If your answer to "A" is yes, describe each lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, giving the same information.)
  1. Approximate date of filing lawsuit: N/A
  2. Parties to previous lawsuit:  
Plaintiff(s): N/A
  - Defendant(s): N/A
  3. Court (If federal, name the district; if state, name the county) N/A
  4. Docket Number: N/A
  5. Name of judge to whom case was assigned: N/A
  6. Disposition: (Was the case dismissed, appealed, still pending?)  
N/A

7. Approximate date of disposition: N/A

III. EXHAUSTION OF GRIEVANCE PROCEDURES:

Have you exhausted both steps of the grievance procedure in this institution?  YES  NO

Attach a copy of the Step 2 grievance with the response supplied by the prison system.

See Brief

IV. PARTIES TO THE SUIT:

A. Name or address of plaintiff: LININGS, Shana, Brown, Burton, Florence,  
Cronce, (ET AL EXH. #31-2) 1511 Preston Ave. Houston, TX 77002

B. Full name of each defendant, his official position, his place of employment, and his full mailing address.

Defendant #1: Geo BrawP Inc. 1511 Preston Ave Houston Tx 77002

Briefly describe the act(s) or omission(s) of this defendant, which you claimed harmed you.

The Defendant's Faulty Is Plagued With Some Very Violent Access To Comm Unit  
(see brief).  
Defendant #2: TDCJ: B.P.P. P.O. BOX 99 Huntsville, TX 77342

Briefly describe the act(s) or omission(s) of this defendant, which you claimed harmed you.

THE DEFENDANTS USE OF FLUGAL REMOVING PRACTICES CONSPIRING WITH  
COM WRY TO DENY AND MORN FROM THE GOVT. SOME TO PACE US IN DRUG CLASS  
(see brief)

Defendant #3: Frank Hale TDCJ Access To Comm Director

P.O. Box 99 Huntsville, TX 77342

Briefly describe the act(s) or omission(s) of this defendant, which you claimed harmed you. FAILED TO

ASSURE THE CORRECT ORDER OR ACCESS TO COMM UNIT WAS MET  
FURTHER IN HIS DUTY TO ASSURE THE INMATES HAD EASY ACCESS TO COMM RGM'S. HE  
MET (see brief)

Defendant #4: Bimo (LIVINGSTON) TDCJ DIRECTOR

P.O. 99 HUNTSVILLE TX 77342

Briefly describe the act(s) or omission(s) of this defendant, which you claimed harmed you. THE CPFF

FURTHER TO ASSURE IT'S CONFINED FAULTIES MET CONSTITUTIONAL STANDARDS.

Defendant #5: TDCJ-COM WRY FOUNDATION DIRECTOR LEWIS

1511 Preston Ave Houston, TX 77002

Briefly describe the act(s) or omission(s) of this defendant, which you claimed harmed you.

CONSPIRED TO USE THE ADMINISTRATIVE PROCEDURES WITH THE  
TDCJ'S B.P.P. TO DEFEND THE SAME TAX PAYERS, & FEDERAL GOVT  
OUT OF FUNDING TO PLATE TECHNICAL VIOLATIONS IN THE DRUG  
TREATMENT CLASSES WITHOUT JUST CAUSE? WHEN THE  
PRISONER DO NOT MEET THE STANDARDS (see brief).

State here in a short and plain statement the facts of your case, that is, what happened, where did it happen, when did it happen, and who was involved. Describe how each defendant is involved. You need not give any legal argument or cite any cases or statutes. If you intent to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach extra pages if necessary, but remember that the complaint must be stated briefly and concisely. IF YOU VIOLATE THIS RULE, THE COURT MAY STRIKE YOUR COMPLAINT.

THE GEO GROUP INC HAS VOLUNTARILY PAST, PRESENTS TOUS PRISONERS CONSTITUTIONAL RIGHTS AND REFUSE TO CORRECT SUCH FILTHY, UNSANITARY LIVING CONDITIONS, AND DENIAL OF ACCESS TO LAW BOOKS; RESEARCH AT THE LAW LIBRARY, UNSANITARY KITCHEN, SHOWER FACILITIES, AS OF THE FELONS OR TUES COMPLAINT. THEY ARE P.P. AURS OR OMISION INFRINGES OR IGNORE THESE CONDITIONS SINCE THE OPEN INS OF THEM CONVICTS TURNED THEM HEARS TO THESE CONDITIONS; UPON THEIR INSPECTIONS TO BE IN COMPLIANCE WITH THIS COUNTY'S FINAL ORDERS ONCE BEFORE ~~CONVICTION~~ OR SINCE CONDITIONS, THE B.P.P. GATEWAY ARE USING LIVELIHOOD PROGRAMS TO TURN PRISONERS AT THESE UNCONSTITUTIONAL FACILITIES, AND TURN PRISONERS IN THESE PRISONS UNDER DURESS WORKERS SEE ATTACH

VI. RELIEF: State briefly exactly what you want the court to do for you. Make no legal arguments. Cite not cases or statutes. IN JUNCTIVE, DECLATORY RELIEF, PUNITIVE DAMAGES.

ORDER THE GEO GROUP INC TO PURCHASE THE REQUIRED LAW BOOKS IN THE LAW LIBRARY  
GIVE US DIRECT ACCESS TO IT, ORDER FLORIDA STATE TO MONITOR SHOT FACILITIES, ORDER  
THE FED. GOVT. TO INVESTIGATE THE MURDEROUS PRACTICING PRISONERS THAT DON'T  
SEE ATTACH

#### VII. GENERAL BACKGROUND INFORMATION:

A. State, in complete form, all names you have ever used or been known by including any and all aliases:

1250833, 1316536, 1604384, 1290418, 556412, 654322  
BURTON, SHANE, LIVINGS, BROWN, ORVABOE, 1001SE

B. List all TDCJ-ID identification numbers you have ever been assigned and all other state or federal prison or FBI numbers ever assigned to you, if know to you.

1250833, 1316536, 1604384, 1290418, 556412, 654322, 471746  
BURTON CRNT, SHANE, 1004233, BROWN, ORVABOE, FLORANCE  
MEMORANDUMS) CAN REMOVED, OMAR CRNC, DONN RONNIE, NO

#### VIII. SANCTIONS:

A. Have you been sanctioned by any court as a result of any lawsuit you have filed? YES  NO

B. If your answer is "yes", give the following information for every lawsuit in which sanctions were imposed. (If more than one, use another piece of paper and answer the same questions.)

1. Court that imposed sanctions (If federal, give district and division): N/A

2. Case Number: N/A

3. Approximate date sanctions were imposed: N/A

4. Have the sanctions been lifted or otherwise satisfied? YES  NO

## CONTINUATION OF PARAGRAPH IV Statement Of Claim

THE PERSONS HAVING ANY SAY So As GATEWAY-TOCT-B.P.P.  
 FOUNDATION DRUG AND ALCOHOL TREATMENT CLIENTS RIGHTS STATES,  
 ILLEGAL PROCEDURES ARE BEING USED BY THE DEFENDANTS TO  
 PLACE PERSONS IN THESE PROGRAMS THAT DOES NOT QUALIFY  
 THE ILLEGAL PROCEDURES TO WITH FALSE INFORMATION ABOUT  
 WHY YOU'RE PLACED IN THESE PROGRAMS ARE BEEN DONE BY THE  
 DEFENDANTS IN BAD FAITH FOR FINANCIAL GAIN AND JOB SECURITY.  
 THE B.P.P. AND GATEWAY ARE USING ILLEGAL PROCEDURES TO  
 NOT ABIDE BY IT'S PROCEDURE'S GOVERNING THE PROCESS OF  
 YOUR GO DAY SAY BY DEFRAUDING OUR DISPOSITION DATE  
 ACCUMULATED FORT TIME FROM USE WITHOUT DUE PROCESS.  
 THE GATEWAY PROGRAM AND BOARDS DOES NOT FOLLOW THE  
 PROCEDURES OUR LOVES IN THEIR HAND BOOKS. DUE TO THE  
 CONFUSING, CONFICTING BOOKS. TO USE THESE ILLEGAL AD-  
 MINISTRATIVE PROCEDURES IN BAD FAITH, AND SAYING THAT  
 THE B.P.P. AND TOCT-BPP; THE COMBINED AGENCIES HAS BEEN  
 BY OMISSIONS TO CONTINUE THESE CONFUSING ILLEGAL AD-  
 MINISTRATIVE PROCEDURES. (SEE BRIEF).

CONTINUATION ~~VI~~, VI, RELIEF

FOR IN THIS PROGRAM, THE COURT ORDER ~~A HARRING~~ AND REVIEW  
 RECORDS, OF PERSONS HARRING RECORDS AND GATEWAY RECORDS,  
 ORDER THE DEFENDANTS TO COMPLY WITH HEALTH AND SAFETY STAN-  
 DARDS. AND ISSUE CLEANING MATERIAL AND EQUIPMENT DAILY TO  
 CLERK TRUCKS, SHOWERS, TOILETS, KITCHEN CLOSETS TO COMPLY WITH  
 HEALTH AND SAFETY STANDARDS.

APPOINT AN ATTORNEY TO PLAINTIFF'S; AND APPOINT ALAN BREED  
 TO COME MONITOR, INTERVIEW PRISONERS AT FACILITIES THAT THIS  
 COURT DOES USE MR. BREED TO DO ON BEHALF ON THIS  
 COURT AND THEM PRISONERS.

MONITOR, INVESTIGATE THE TDET B.P.P. SANCTION FRAUDS AND ORDER  
 THE BOARD TO IMPLEMENT STRUCTURE ON ISSUANCE OF TECHNICAL WRITING

D. If your answer is "yes", give the following information for every lawsuit in which warning was imposed.  
 (If more than one, use another piece of paper and answer the same questions.)

1. Court that imposed warning (if federal, give the district and division): N/h
2. Case number: N 17
3. Approximate date warning were imposed: N 17

Executed on: \_\_\_\_\_  
 (Date)

(Printed Name)

(Signature of Plaintiff)

### PLAINTIFF'S DECLARATIONS

1. I declare under penalty of perjury all facts presented in this complaint and attachment thereto are true and correct.
2. I understand if I am released or transferred, it is my responsibility to keep the Court informed of my current mailing address and failure to do so may result in the dismissal of this lawsuit.
3. I understand that I must exhaust all available administrative remedies prior to filing this lawsuit.
4. I understand I am prohibited from bringing an *in forma pauperis* lawsuit if I have brought three or more civil actions in a Court of the United States while incarcerated or detained in any facility, which lawsuits are dismissed on the ground they were frivolous, malicious, or failed to state a claim upon which relief may be granted, unless I am under imminent danger or serious physical injury.
5. I understand even if I am allowed to proceed without prepayment of costs, I am responsible for the entire \$350 filing fee and costs assess by the Court, which shall be deducted in accordance with the law from the inmate account by my custodian until the filing fee is paid.

Signed this 11 day of JUNE, 2008.  
 (Day) (Month) (Year)

Stephen Living  
 (Printed Name)

S. P.

(Signature of Plaintiff)

Charles Brown, Charles Slade, Richard Burton, Thomas Flanagan  
Charles Brown, Charles Slade, Richard Burton, Thomas Flanagan

WARNING: The Plaintiff is hereby advised any false or deliberately misleading information provided in response to the following questions will result in the imposition of sanctions. The sanctions the Court may impose include, but are not limited to monetary sanctions and/or the dismissal of this action with prejudice.

To: Federal Clerk 6-11-08  
Attn: Michael Milby  
Address: P.O. Box 61010 United States District Court  
Houston, Texas 77208 Southern District of Texas  
FILED JUN 19 2008  
Michael N. Milby, Clerk

From: [REDACTED] Plaintiffs Stephen Livings Et Al, I re  
regards to your busy schedule I'll be as brief  
as possible.

I now ask that you file the enclosed 1983  
lawsuit and all attached exhibits, complaints and disposition  
paper's in the appropriate court and inform myself of the  
Appointed CASE No.

I also like to state that the said Plaintiff in  
this case is currently proceeding in Lamer teens and ask  
the Honorable Judge of said court to take this  
fact into consideration.

Respectfully Submitted,  
Stephen F.

#604384-30-19  
Stephen L. Lings-Et AL  
1511 Preston Avenue  
Houston, Texas 77003

United States District Court  
Southern District of Texas  
FILED

JUN 18 2008

Michael N. Milby  
Clerk of Court

To: Federal Clerk  
Attn: Michael Milby  
P.O. Box 61010  
Houston, Texas 77208

L E G A L